

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

ATTORNEY GENERAL PETER F. KILMARTIN, :
IN HIS OFFICIAL CAPACITY, :
PLAINTIFF, :

C.A. NO.: P.C. 15-

V. :

ALBION FIRE DISTRICT :
DEFENDANT. :

COMPLAINT

I. INTRODUCTION

Attorney General Peter F. Kilmartin ("Attorney General"), acting in his official capacity, brings this action upon information and belief that the Albion Fire District ("Fire District") committed a willful and knowing, or reckless, violation of the Rhode Island Access to Public Records Act ("APRA") when it failed to timely comply with R.I. Gen. Laws § 38-2-3.16. The Attorney General respectfully requests that this Honorable Court declare that the actions of the Fire District violated the APRA, assess civil fines and attorneys fees against the Fire District, and further order any other such remedy this Honorable Court deems just and equitable.

II. PARTIES

1. Plaintiff is the Attorney General of the State of Rhode Island. Pursuant to R.I. Gen. Laws § 38-2-8(d), the Attorney General may initiate a complaint on behalf of the public interest, and may institute proceedings for civil penalties and/or injunctive or declaratory relief.
2. Defendant, the Fire District, is a "public body" as defined by Rhode Island General Laws § 38-2-2(1), and is thus subject to the APRA. See R.I. Gen. Laws § 38-2-1 et seq.

III. JURISDICTION

3. The Rhode Island Superior Court is vested with jurisdiction over this matter pursuant to R.I. Gen. Laws § 38-2-9.

IV. FACTS

4. The APRA requires that “Not later than January 1, 2013, and annually thereafter, the chief administrator of each agency and each public body shall state in writing to the attorney general that all officers and employees who have the authority to grant or deny persons or entities access to records under this chapter have been provided orientation and training regarding this chapter.” R.I. Gen. Laws § 38-2-3.16.
5. Pursuant to R.I. Gen. Laws § 38-2-3.16, the Fire District was required to file an APRA Compliance Certification form no later than January 1, 2015 for the calendar year 2015.
6. On January 20, 2015, email correspondence was sent by the Department of Attorney General to the Fire District or its agent requesting the required APRA Compliance Certification Form (“certification form”) of its officers and employees who have the authority to grant or deny persons or entities access to records pursuant to R.I. Gen. Laws § 38-2-3.16.
7. On January 20, 2015, the Fire District or its agent, through email correspondence, stated that it had prepared a certification form for legal counsel and would provide the clerk’s form upon receipt.
8. Since this Department did not receive any certification forms for legal counsel or the clerk, or anyone else from the Fire District, this Department sent a follow up correspondence on February 6, 2015, to the Fire District or its agent for the requested certification forms required pursuant to R.I. Gen. Laws § 38-2-3.16.

9. No response was received from the Fire District or its agent providing the required certification forms by February 20, 2015.
10. On February 24, 2015, this Department sent a final notice to the Fire District or its agent requesting the certification forms required pursuant to R.I. Gen. Laws § 38-2-3.16.
11. On February 24, 2015, this Department received a response from the Fire District or its agent, declaring that he would “check to see where they mailed it” and would “try to scan a copy and provide it to [the Department].”
12. The certification forms required pursuant to R.I. Gen. Laws § 38-2-3.16 were not received by this Department prior to March 3, 2015.
13. On March 3, 2015, the Attorney General sent an APRA investigatory demand concerning the APRA certification forms required to be submitted to this Department pursuant to R.I. Gen. Laws § 38-2-3.16.
14. On March 3, 2015, the Fire District or its agent provided scanned copies of the APRA certifications requested by this Department, stating that “there was an oversight in [his] office as [he] believed the original had been mailed to [this Department].”
15. On March 3, 2015, this Department acknowledged the receipt of such APRA certifications, however, stated the investigation into the Fire District’s failure to comply with R.I. Gen. Laws § 38-2-3.16 still stands. The Department further noted that the 2011 APRA certification for the Fire District’s Clerk did not extend to 2015. R.I. Gen. Laws § 38-2-3.16.
16. The certification forms sent by the Fire District or its agent, on or about March 3, 2015, represent the first time the Fire District had provided APRA Certification Forms to the Department of Attorney General.

17. On May 18, 2015, this Department issued a finding, In Re: Albion Fire District PR 15-18, wherein this Department found the Fire District in violation of the APRA. Exhibit A, In Re: Albion Fire District PR 15-18. Specifically, this Department found the Fire District violated the APRA when it failed to timely respond to this Department's request for the Fire District's APRA certification forms until March 3, 2015. See R.I. Gen. Laws § 38-2-3.16
18. After concluding that the Fire District violated the APRA, this Department allowed the Fire District the opportunity to address whether the violation was knowing and willful, or reckless.
19. By supplemental finding dated October 23, 2015, this Department concluded that the APRA violation in In Re: Albion Fire District PR 15-18, was willful and knowing, or reckless. Exhibit B, In Re: Albion Fire District PR 15-18B.

V. COUNT ONE – VIOLATION OF THE APRA

20. Plaintiff hereby incorporates Paragraphs 1 through 19 herein.
21. The Fire District violated the APRA when it failed to timely comply with R.I. Gen. Laws § 38-2-3.16.
22. Plaintiff asks this Honorable Court to declare that the Fire District violated R.I. Gen. Laws § 38-2-3.16

VI. COUNT TWO – WILLFUL AND KNOWING, OR RECKLESS VIOLATION

23. Plaintiff hereby incorporates Paragraphs 1 through 22 herein.

24. The Fire District willfully and knowingly, or recklessly, violated R.I. Gen. Laws § 38-2-3.16 when it failed to timely comply with § 38-2-3.16.

a. The Fire District, through prior demands and notices sent by this Department, had actual knowledge of the APRA requirements prescribed by R.I. Gen. Laws § 38-2-3.16

25. Plaintiff asks this Honorable Court to assess a civil fine against the Fire District for a willful and knowing, or reckless, violation in accordance with R.I. Gen. Laws § 38-2-9(d).

26. Plaintiff asks this Honorable Court to assess attorney fees and costs against the Fire District pursuant to R.I. Gen. Laws § 38-2-9(d).

WHEREFORE, pursuant to R.I. Gen. Laws § 38-2-8(b), Plaintiff respectfully requests this Honorable Court 1) declare that the Fire District willfully and knowingly, or recklessly, violated R.I. Gen. Laws § 38-2-3.16.; 2) assess civil penalties against the Fire District in accordance with R.I. Gen. Laws § 38-2-9(d); 3) assess attorney fees and costs against the Fire District in accordance with R.I. Gen. Laws § 38-2-9(d); and 4) further award any such relief as this Court deems just and equitable.

PLAINTIFF DEMANDS A JURY TRIAL

Respectfully submitted,

PLAINTIFF,
By his Attorney,

PETER F. KILMARTIN
ATTORNEY GENERAL

/s/ Malena Lopez Mora
Malena Lopez Mora (#8730)
Special Assistant Attorney General

Department of Attorney General
150 South Main Street
Providence, Rhode Island 02903
Tel: (401) 274-4400, ext. 2307
Fax: (401) 222-3016

Dated: October 26, 2015.

EXHIBIT A



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

150 South Main Street • Providence, RI 02903

(401) 274-4400 - TDD (401) 453-0410

Peter F. Kilmartin, Attorney General

VIA EMAIL ONLY

May 18, 2015

PR 15-18

Louis DeSimone, Esq.

In Re: Albion Fire District

Dear Attorney DeSimone:

This Department's Access to Public Records Act ("APRA") investigation involving the Albion Fire District ("District") is complete. By correspondence dated March 3, 2015, this Department initiated the instant APRA investigation against the District for failure to timely comply with R.I. Gen. Laws § 38-2-3.16. See R.I. Gen. Laws § 38-2-8(d). The pertinent facts are as follows.

On January 20, 2015, this Department notified the District that the required APRA Compliance Certification Form ("certification form"), which certifies that an employee or officer of a public body has received the mandatory APRA training pursuant to R.I. Gen. Laws § 38-2-3.16, had not been submitted to this Department for calendar year 2015. Certification forms for calendar year 2015 were due no later than January 1, 2015. Also on January 20, as legal counsel for the District, you replied that "the Albion Public Records Rules provide for the clerk and legal counsel to have authority to receive and act upon requests for public records. I have prepared the certification form for myself and will provide the clerk's form upon receipt." Since we received no certification forms for yourself, the Clerk, or any other District personnel, a follow up correspondence was sent on February 6 which read, in pertinent part:

"Upon review of our records, it has come to our attention that the Albion Fire District is not in compliance with the Access to Public Records Act ('APRA').

The required training may be completed by viewing the video of our Open Government Summit on our website...Once you have viewed the Access to Public Records Act portion of the presentation, complete the enclosed certification form and forward it to this Department.

Please be advised that if we do not receive a completed certification form by February 20, 2015, this Department may seek additional measures to ensure compliance." (Emphasis original).

Notwithstanding our February 20 deadline, no certification forms were received by February 20, 2015. Thereafter, on February 24, a final notice was sent inquiring whether the District had in fact submitted the certification form but, perhaps, it was not received or mis-received by this Department. A reply was received the same day, which stated that "[you would] check to see where they mailed it," and that you would "try to scan a copy and provide it to [this Department]." On March 3, still having received no certification forms, this Department opened the instant investigation against the District for failure to comply with R.I. Gen. Laws § 38-2-3.16 and we instructed the District to provide a substantive response addressing this issue within ten (10) business days. Also on March 3, after receiving our demand letter, you provided a response on behalf of the District. The District stated, in relevant part:

"Attached is my certification as legal representative of the Albion Fire District. The document executed by the clerk is also attached.

Please note that your correspondence indicates that no response to the inquiries was forthcoming from the [D]istrict. I had discussed this matter with Assistant Attorney General Field via email and advised that the documents would be provided.

At no point did the [D]istrict ignore any correspondence or request in this regards."

The District sent a second email on March 3 indicating that:

"I have provided scan [sic] copies of the APRA Certifications which were previously referenced.

In this regard, there was an oversight in my office as I believed the original had been mailed to your office. My file indicates that it was not in fact mailed.

As such, it is requested that you accept the documents provided as timely filed in response to your original inquiry."

Attached to the first March 3 correspondence were two (2) certification forms, one executed by you as legal counsel and one executed by the District's Clerk. Your certification form, dated February 11, 2015, certified that you received APRA training on February 11, 2015. The Clerk's certification form, dated February 10, 2015, certified that she received APRA training on January 13, 2011. On March 10, in response to the District's request that we "accept the documents provided as timely filed," this Department informed the District that the investigation into the District's failure to timely comply with R.I. Gen. Laws § 38-2-3.16 remained open and that the District was free to submit a substantive response addressing the issue. We also explained that

since the Clerk certified that she received training in 2011, her 2011 certification did not extend to 2015. See R.I. Gen. Laws § 38-2-3.16.

On March 31, we received a substantive response from the District. In relevant part, the District contends that:

“The [D]istrict clerk and all of its board members have attended the Open Meetings summit provided by your department.

Prior to your correspondence, the [D]istrict was unaware that an additional review course was required. In this regard, upon notification, I as counsel for the entity, reviewed the online video presentation and filed the certification related thereto. It should be noted that the rules promulgated by the [D]istrict for requesting public records designate legal counsel and the clerk as the persons responsible for responding to such requests.

At this time, the clerk is in the process of updating her certification. Pending submission of her re-certification, all public records requests will be reviewed by legal counsel prior to response.”

At the outset, we note that in examining whether a violation of the APRA has occurred, we are mindful that our mandate is not to substitute this Department’s independent judgment concerning whether an infraction has occurred, but instead, to interpret and enforce the APRA as the General Assembly has written this law and as the Rhode Island Supreme Court has interpreted its provisions. Furthermore, our statutory mandate is limited to determining whether the District violated the APRA. See R.I. Gen. Laws § 38-2-8. In other words, we do not write on a blank slate.

Rhode Island General Laws § 38-2-3.16 provides “[n]ot later than January 1, 2013, and annually thereafter, the chief administrator of each agency and each public body shall state in writing to the attorney general that all officers and employees who have the authority to grant or deny persons or entities access to records under this chapter have been provided orientation and training regarding this chapter. The attorney general may, in accordance with the provisions of chapter 35 of title 42, promulgate rules and regulations necessary to implement the requirements of this section.” To satisfy the orientation and training requirement, a member of a public body may attend an Attorney General training in person or view a recent video of an Access to Public Records Act presentation given by the Department of Attorney General, which is available on the Attorney General’s website. See Rules and Regulations Regarding Training under the Access to Public Records Act. In addition, after satisfying the Access to Public Records Act training requirement, that individual “must certify to the Chief Administrative Officer that he or she viewed the entire Access to Public Records Act presentation, or attended the live training program, and such certification shall be forwarded by the Chief Administrative Officer to the Department of Attorney General.” Id. Stated differently, compliance with R.I. Gen. Laws § 38-2-3.16 is conditioned on timely satisfying two (2) requirements: 1) receiving the required annual training and 2) providing this Department with annual certification of that training.

The evidence shows that despite repeated notice from this Department on January 20, February 6, and February 24, and despite the District's assurances on January 20 and February 24 that the certifications were "forthcoming," no certifications were received until March 3, after the District received notice of the present investigation. Still, of the two certification forms submitted, only one brought the District in compliance with the APRA since the Clerk's 2011 training did not extend to 2015.¹ Moreover, according to your certification form, it appears that you fulfilled the training requirement on February 11, 2015, after the time for certification (and obviously training) had already passed. See R.I. Gen. Laws § 38-2-3.16.

Here, the District does not contest the fact that the certification form was untimely filed, only that this was due to an "oversight." Respectfully, we find this argument unpersuasive since this Department advised the District on January 20, February 6, and February 24, that this Department was not in receipt of a certification form and the District advised this Department on more than one occasion that the certification forms were "forthcoming." While the District contends that "at no point did the [D]istrict ignore any correspondence or request in this regard," ultimately, it was the commencement of this investigation – one and a half months after the District received its first notice of non-compliance – that prompted the District to submit the certification form. Although the District is presently in compliance with R.I. Gen. Laws § 38-2-3.16, it is not lost upon this Department that the District's present compliance was untimely and the result of this Department expending its limited resources through repeated notices as well as the initiation of this complaint. Therefore, we find that the District violated the APRA when it failed to timely comply with R.I. Gen. Laws § 38-2-3.16.

Upon a finding of an APRA violation, the Attorney General may file a complaint in Superior Court, requesting "injunctive or declaratory relief." See R.I. Gen. Laws § 38-2-8(b). Also a court "shall impose a civil fine not exceeding two thousand dollars (\$2,000) against a public body...found to have committed a knowing and willful violation of this chapter, and a civil fine not to exceed one thousand dollars (\$1,000) against a public body found to have recklessly violated this chapter***." See R.I. Gen. Laws § 38-2-9(d). Based on the totality of the circumstances, we have concerns that the District's failure to timely comply with R.I. Gen. Laws § 38-2-3.16 rises to the level of knowing and willful, or, alternatively, reckless violation.²

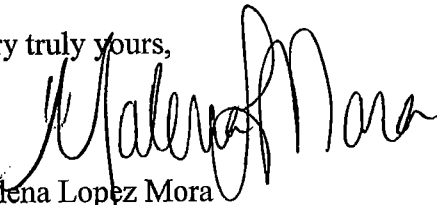
¹ It deserves mentioning that, as of the date of this finding, this Department has not received an updated certification form from the District's Clerk.

² The Rhode Island Supreme Court examined the "knowing and willful" standard in Carmody v. Rhode Island Conflict of Interest Comm'n, 509 A.2d 453 (R.I. 1986). In Carmody, the Court determined that:

"the requirement that an act be 'knowingly and willfully' committed refers only to the concept that there be 'specific intent' to perform the act itself, that is, that the act or omission constituting a violation of law must have been deliberate, as contrasted with an act that is the result of mistake, inadvertence, or accident. This definition makes clear that, even in the criminal context, acts not involving moral turpitude or acts that are not inherently wrong need not be motivated by a

Therefore, consistent with this Department's practice, the District shall have ten (10) business days from receipt of this finding to provide us with a supplemental explanation as to why its failure to timely comply with R.I. Gen. Laws § 38-2-3.16 should not be considered knowing and willful, or reckless, in light of its recognition of the APRA and this Department's repeated requests to comply with its requirements. At the end of this time period, we will issue our supplemental finding on this matter and determine whether civil fines are appropriate.

Very truly yours,



Malena Lopez Mora
Special Assistant Attorney General
Extension 2307

wrongful or evil purpose in order to satisfy the 'knowing and willful' requirement." See id. at 459.

In a later case, DiPrete v. Morsilli, 635 A.2d 1155 (R.I. 1994), the Court expounded on Carmody and held:

"that when a violation of the statute is reasonable and made in good faith, it must be shown that the official 'either knew or showed reckless disregard for the question of whether the conduct was prohibited by [the] statute * * * Consequently an official may escape liability when he or she acts in accordance with reason and in good faith. We have observed, however, that it is 'difficult to conceive of a violation that could be reasonable and in good faith. In contrast, when the violative conduct is not reasonable, it must be shown that the official was 'cognizant of an appreciable possibility that he [might] be subject to the statutory requirements and [he] failed to take steps reasonably calculated to resolve the doubt.'" (internal citations omitted). Id. at 1164. (Emphasis added).

EXHIBIT B



State of Rhode Island and Providence Plantations

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Peter F. Kilmartin, Attorney General

VIA EMAIL ONLY

October 26, 2015

PR 15-18B

Louis DeSimone, Esq.

In Re: Albion Fire District

Dear Attorney DeSimone:

This correspondence serves as a supplemental finding to In Re: Albion Fire District, PR 15-18, released May 18, 2015. In In Re: Albion Fire District, we initiated an Access to Public Records Act ("APRA") investigation into the Albion Fire District's ("Fire District") failure to timely comply with R.I. Gen. Laws § 38-2-3.16 and concluded that the Fire District violated the APRA when it failed to timely comply with R.I. Gen. Laws § 38-2-3.16. See R.I. Gen. Laws § 38-2-8(d). The sole issue to be addressed in this supplemental finding is whether the Fire District's violation was willful and knowing, or reckless. As requested, the Fire District responded to our inquiry and we now resolve this outstanding issue.

By correspondence dated June 10, 2015, you provided a supplemental response on behalf of the Fire District. In pertinent part, the Fire District states:

"As previously stated, prior to your correspondence, the district was unaware that an additional review course was required.

With regard to any question as to intentional conduct, the district attempted to comply upon notification by the department and immediately updated the applicable certification through use of the video stream offered. Further, as evidenced by the affidavit, the error was due to a lack of information and constituted an oversight by the district."

Included in the Fire District's supplemental response was an affidavit by the Fire District's Clerk, Ms. Lois Moore. In relevant part, Ms. Moore attests:

"During 2011, members of the Board of Fire Commissioners and I attended the Attorney General's Open Government Summit in order to become familiar with

the procedures for open meetings and open records requests under Rhode Island law.

Upon notification that my certification as the contact person for public records requests was not sufficient under the required regulations, I reviewed the video presentation through the link provided by the Office of the Attorney General and submitted the requisite form for certification through the district's legal counsel.

Prior to said notification from our counsel, I was unaware of the certification requirement beyond my attendance at the Open Government Summit.

At no time did the district willfully or knowingly fail to provide indicia of certification to the attorney general's representative. Any gap in certification was inadvertent and due to the district being unaware of the requirements.

At no time during my tenure as clerk has there been any intent on behalf of the district commissioners or myself to violate or subvert the Open Meetings Law, Public Records Law or any ruling issued by the Office of the Attorney General."

Our focus is whether the Fire District knowingly and willfully, or recklessly, violated the APRA. The Rhode Island Supreme Court examined the "knowing and willful" standard in Carmody v. Rhode Island Conflict of Interest Comm'n, 509 A.2d 453 (R.I. 1986). In Carmody, the Court determined that:

"the requirement that an act be 'knowingly and willfully' committed refers only to the concept that there be 'specific intent' to perform the act itself, that is, that the act or omission constituting a violation of law must have been deliberate, as contrasted with an act that is the result of mistake, inadvertence, or accident. This definition makes clear that, even in the criminal context, acts not involving moral turpitude or acts that are not inherently wrong need not be motivated by a wrongful or evil purpose in order to satisfy the 'knowing and wilful' requirement." See id. at 459.

In a later case, DiPrete v. Morsilli, 635 A.2d 1155 (R.I. 1994), the Court expounded on Carmody and held:

"that when a violation of the statute is reasonable and made in good faith, it must be shown that the official 'either knew or showed reckless disregard for the question of whether the conduct was prohibited by [the] statute * * * Consequently an official may escape liability when he or she acts in accordance with reason and in good faith. We have observed, however, that it is 'difficult to conceive of a violation that could be reasonable and in good faith. In contrast, when the violative conduct is not reasonable, it must be shown that the official

was ‘cognizant of an appreciable possibility that he [might] be subject to the statutory requirements and [he] failed to take steps reasonably calculated to resolve the doubt.’ (internal citations omitted). Id. at 1164. (Emphasis added).

In Catanzaro v. East Greenwich Police Department, PR 13-08, this Department addressed the “reckless” standard for the first time since the APRA was amended to include a civil penalty of \$1,000 for a “reckless” violation of the law. Regrettably, the APRA itself does not provide a definition of “reckless,” and therefore, we look for guidance from other authorities.

As we observed in Catanzaro, Rhode Island General Laws § 3-14-7(c)(1) entitled, “Liability for Reckless Service of Liquor” states:

“[s]ervice of liquor is reckless if a defendant intentionally serves liquor to an individual when the server knows that the individual being served is a minor or is visibly intoxicated, and the server consciously disregards an obvious and substantial risk that serving liquor to that individual will cause physical harm to the drinker or to others.” (Emphasis added).

Black’s Law Dictionary defines reckless as:

“[c]haracterized by the creation of substantial and unjustifiable risk of harm to others and by a conscious (and sometimes deliberate) disregard for or indifference to that risk; heedless; rash. Reckless conduct is much more than mere negligence; it is a gross deviation from what a reasonable person would do.” See Black’s Law Dictionary (9th ed. 2009).

According to the Restatement (Third) of Torts, an actor’s conduct is reckless if:

“(a) the actor knows of the risk of harm created by the actor’s conduct, or knows facts that make that risk obvious to anyone in the actor’s situation, and (b) the precaution that would eliminate or reduce that risk involves burdens that are so slight relative to the magnitude of the risk as to render the actor’s failure to adopt the precaution a demonstration of the actor’s indifference to the risk.” See REST 3d TORTS-PEH § 2.

In In Re: Albion Fire District, PR 15-18, this Department had little difficulty concluding that the Fire District violated the APRA when it failed to submit APRA certifications by January 1, 2015 as required by R.I. Gen. Laws § 38-2-3.16.¹ In fact, it was not until after this Department

¹ Rhode Island General Laws § 38-2-3.16 requires that “[n]ot later than January 1, 2013, and annually thereafter, the chief administrator of each agency and each public body shall state in writing to the attorney general that all officers and employees who have the authority to grant or deny persons or entities access to records under this chapter have been provided orientation and training regarding this chapter.”

In Re: Albion Fire District

PR 15-18B

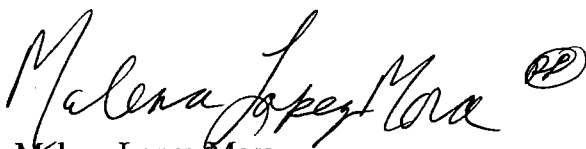
Page 4

initiated this investigation on March 3, 2015, that the Fire District ultimately submitted certification.

Even if we were to accept the Fire District's explanation that "the district was unaware that an additional review course was required," the fact that this Department sent several notifications to the Fire District that this Department was not in receipt of the Fire District's APRA certification form, in our opinion, demonstrates that the Fire District was "cognizant of an appreciable possibility that [it might] be subject to the statutory requirements and [it] failed to take steps reasonably calculated to [address the issue]." See DiPrete, 635 A.2d at 1164. Specifically, the Fire District was advised that they were not in compliance with R.I. Gen. Laws § 38-2-3.16 on January 20, February 6, and February 24. Respectfully, we reject the Fire District's argument that "the district attempted to comply upon notification by the department and immediately updated the applicable certification," since no certification was received until March 3, 2015 – nearly two months after first being notified of the Fire District's noncompliance by this Department on January 20. Indeed, the fact that the Fire District assured this Department on January 20 and February 24, 2015 that certifications were "forthcoming," serves as further evidence that the Fire District was "cognizant of an appreciable possibility that [it might] be subject to the statutory requirements and [it] failed to take steps reasonably calculated to [address the issue]." See id.

Given the evidence before us, in particular the multiple notifications by this Department, the Fire District's assurances, and the Fire District's failure to provide a certification form until after this Department initiated this complaint, we find that the Fire District willfully and knowingly, or recklessly, violated the APRA when it failed to comply with R.I. Gen. Laws § 38-2-3.16. Accordingly, this Department will file a civil lawsuit against the Albion Fire District.

Very truly yours,

A handwritten signature in cursive script, reading "Malena Lopez Mora", followed by a circled "PP" monogram.

Malena Lopez Mora
Special Assistant Attorney General